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October 26, 2023

Via CM/ECF and Email

Hon. Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***Contrarian Capital Management, LLC, et al. v. Bolivarian Republic of Venezuela*, 19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 19 Civ. 3123 & 18 Civ. 11940): Response to Plaintiffs' Pre-Motion Letter To Amend Third Supplemental Complaint**

Dear Judge Torres,

We represent Defendant, the Bolivarian Republic of Venezuela. We write in response to Plaintiffs' Pre-Motion Letter to Amend Third Supplemental Complaint, dated October 19, 2023 (the "Motion to Amend").

Defendant consents to Plaintiffs' Motion to Amend, provided that Plaintiffs withdraw their pending application for default judgment (Dkts. 138-141), as indicated in the Motion to Amend. Defendant's consent does not constitute a concession, acknowledgement, or endorsement of any fact, allegation, contention, or claim in Plaintiffs' Proposed Amended Third Supplemental Complaint. Defendant reserves all rights and waives none.

Sincerely,

/s/ Camilo Cardozo
Camilo Cardozo

Cc: All counsel (by CM/ECF)